Nicholas C. Inman State Bar No. 00787747 ALLMAND LAW FIRM, P.L.L.C. 860 Airport Freeway Suite 401 Hurst, TX 76054 214.265.0123 Phone 214.265.1979 Fax ATTORNEY FOR DEBTOR

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE: §

ERVIN FRANK LAYER § CASE NO. 17-32670-13

Debtor § CHAPTER 13

# MOTION TO SHORTEN TIME RE: DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

#### TO THE HONORABLE JUDGE OF THIS COURT

ERVIN LAYER requests that notice be shortened on her Motion to Extend Stay:

- This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
- Debtor filed her Motion to Extend Automatic Stay and Notice of Hearing on said motion on 7/11/17.
- 3. A hearing on the Motion to Extend Automatic Stay is set for 8/3/17 at 9:00 am
- 4. As of the date of filing, the hearing date chosen was the best available self-calendaring date that fell within thirty (30) days of case filing and provided the most time for notice to creditors, which was less than the standard twenty-four (24) days.
- 5. In order to ensure that the hearing is held before the expiration of the automatic stay the Debtor requests that the notice period for her Motion to Extend Automatic be shortened from the standard twenty-four (24) day notice period with a hearing to be held on 8/3/17

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests the Court to enter an Order Shortening Time regarding her pending Motion to Extend Automatic Stay, and for such other and further relief both at law and in equity to which the court may deem Debtor is justly entitled.

Dated:July 11, 2017

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Nicholas C. Inman Nicholas C. Inman State Bar No. 00787747 ALLMAND LAW FIRM, P.L.L.C. 860 Airport Freeway Suite 401 Hurst, TX 76054 214.265.0123 Phone 214.265.1979 Fax ATTORNEY FOR DEBTOR

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July11, 2017, a true and correct copy of the foregoing was served on all parties in interest below.

#### **DEBTOR(S)**

Ervin Frank Layer 9814 Faircrest Drive Dallas, TX 75238

#### **STANDING CHAPTER 13 TRUSTEE**

Tom Powers
Office of the Standing Ch. 13 Trustee
125 E. John Carpenter Freeway
11th Floor, Suite 1100
Irving, TX 75062

#### **U.S. TRUSTEE**

Rm. 960 1100 Commerce Street Dallas, TX 75242

By: <u>/s/Nicholas C. Inman</u> Nicholas C. Inman ALLMAND LAW FIRM, P.L.L.C.